

(This Pro Se is written base on article "Revised 04/2008, CN 10554-English (How to File an Answer to a Complaint in the Superior Court)" from webpage "<http://www.judiciary.state.nj.us/prose/index.htm>" and referenced from the "ANSWER" of EPSTEIN BECKER & GREEN, P.C.)

PRO SE

**OCEAN TEXTILE CORPORATION**

Your Name (first, middle, last)

**4980 NW 165<sup>TH</sup> ST, A-15**

Street Address

**HIALEAH, FL 33014**

Town, State, Zip Code

**(305)430-8599**

Telephone Number

RECEIVED

DEC - 1 2008

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH, CLERK

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Civil Action No. 08-4957(SDW)

STAR PACIFIC CORPORATION

Plaintiff

**V.**

STAR ATLANTIC CORPORATION, A New Jersey Corporation, QI LU, individually and as agent for Star Atlantic Corporation (NJ), STAR ATLANTIC CORPORATION, A Florida Corporation, YAFEI ZHAO a/k/a ALFRED ZHAO, individually and as Agent for Star Atlantic Corporation (FL/NJ), ZHENG LI a/k/a MICHAEL LI, a individually and as Agent for Star Atlantic Corporation (FL/NJ), Ocean Textile Corporation and Anan Karina Inc, JOHN DOE #1-10 and JANE DOE #1-10 and XYZ Corporation #1-10,

All names being fictitious and presently unknown,

Defendants

**Answer, Summons in A Civil Action**

The defendant, Ocean Textile Corporation (OTC) only answers the parts that related to OTC and Anna Karina (AKI) from the plaintiff's Complaint as follows. OTC does not have enough information to know whether the remaining statements are true. The parts of related to Li from the plaintiff's Complaint had already answered in the "ANSWER" of EPSTEIN BECKER & GREEN, P.C.

11. Except to admit that Ocean Textile Corporation is a Florida corporation registered at listed address and date, Defendant denies the allegations of Paragraph 11.

12. Except to admit that Anna Karina Inc is located at listed address, Defendant does not have enough information to know whether the statement is true.

1. Ocean Textile Corporation did not produce, import certain products. Therefore, plaintiff's complaint to Ocean Textile Corporation for COPYRIGHT INFRINGEMENT does not exist.

2. Ocean Textile Corporation did not produce, import certain products. Therefore, plaintiff's complaint to Ocean Textile Corporation for TRADE DRESS INFRINGEMENT does not exist.

3. Ocean Textile Corporation is a trading company, so competition is unavoidable and reasonable. OTC has competition with many companies from local, nation wide, international and the Internet in same market. However, most OTC's customers do not know current contact information and products being selling by SPC or SPC-RLO. OTC believes there are no competitions between OTC and SPC or SPC-RLO. Therefore, plaintiff's complaint to Ocean Textile Corporation for UNFAIR COMPETITION does not exist.

### **CERTIFICATION OF NO OTHER ACTIONS**

I certify that this dispute is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: Nov. 25<sup>th</sup>, 2008

Signature: 